

UNITED STATES DISTRICT COURT
THE DISTRICT OF MASSACHUSETTS

Paula O'Donnell,
Plaintiff

v.

Civil Action No. 05-CV-11257- NG

Donna Boggs, et al.,
Defendants.

Plaintiff's Initial Rule 26 Disclosures

A. Individuals Having Relevant Discoverable Information

1. Paula O'Donnell (plaintiff); re. all matters noted in complaint.
2. John O'Donnell, 18 HillView Lane, Plymouth, MA 02360 (508-746-8506); without waiving any relevant privilege, re. medical/psych issues
3. Linda Doucette (address/phone currently unknown); re. investigations and other actions by Defendants in relation to misconduct by this individual
4. Defendants: Donna Boggs, Brendan Hall, Marion Doucette, William Francis, Mary Lou Meghan, Boston Globe Credit Union; re. investigations and other actions in relation to misconduct by Linda Doucette, complaints about and conduct of Marion Doucette, and actions taken in respect to Plaintiff
5. Office of Professional Employees International Union, Local 16, AFL-CIO, 1 Billings Rd., Ste. 200, Quincy, MA 02171; re union actions and conduct in relation to individuals and matters identified in preceding item #2.
6. Catherine Toland, 27 Eddie St., Quincy, MA 02169 (phn 617-328-4515); re. conduct of Linda Doucette and Defendants.

7. Christine Nickerson, 225 Evans St., Weymouth, MA 02191 (781-340-5297); re. conduct of Linda and Marion Doucette, and some Defendants.
8. Lynn Lauro, 84 Puritan Rd., Weymouth, MA 02189 (781-340-4988); re. conduct of Linda and Marion Doucette.
9. Wanda Ridley (address/phone unknown); re. knowledge of fraudulent transactions of Linda Doucette and coverup by Marion Doucette.
10. Eileen Federici-Sullivan, 100 King Hill Rd., Braintree, MA 02184 (phn unkwn); Boston Globe nurses, without waiving any relevant privilege, re. medical and distress issues resulting from conduct of Marion Doucette and Defendants.
11. Richard Bickford, CMG Assoc., 381 Elliot St., Ste. I80L, Newton Upper Falls, MA 02464 (617-969-7600), Globe Employee Assistance Program counselor, without waiving any relevant privilege, re. medical and distress issues resulting from conduct of Marion Doucette and Defendants
12. Ronda Tanquay, 79 Park Ave. West, S. Weymouth, MA 02190 (781-335-1748); re union matters; re. conduct of Linda and Marion Doucette and Defendants.
13. Lisa Lemieux, 81 North St., New Bedford, MA 02740 (508-990-8016); re union matters; re. conduct of Linda and Marion Doucette and Defendants.
14. Dr. Robert Scarlatell, 30 Resnik Rd., Plymouth 02360 (508-746-2900); PCP - without waiving any relevant privilege, re. med/psych issues
15. Heather Ramshead (address/phone inkrown), Nurse Pract under Dr. Robert Sarlatell, without waiving any relevant privilege, re. med/psych issues

16. Mark Dunay, 20 Court ST., Plymouth, MA, 02360 (508-746-8886); MSW, without waiving any relevant privilege, re. med/psych issues
17. Dr. Martin Merowitz, 1A Mayo Rd., Wellesly, MA 02181, without waiving any relevant privilege, re. workers comp evaluation and med/psych issues
18. Anderson and French; CPA, audit firm with information and records regarding misconduct of Linda Doucette
19. Mass. Banking Commission; CPA, audit firm with information and records regarding misconduct of Linda Doucette

B. Documents

Plaintiff is currently compiling documents in her possession and shall make copies available in short order. As to documents not in Plaintiff's possession but relevant or supportive, the following documents are believed held by Defendant Credit Union: personnel records of Linda and Marion Doucette, investigative/audit records related fraudulent transactions of Linda Doucette, any investigation and other records concerning conduct of Marion Doucette and complaints against her made by various parties, including Plaintiff; held by Anderson and French, the CPA audit firm, information and audit records regarding misconduct of Linda Doucette; held by Mass. Banking Commission; information and audit records regarding misconduct of Linda Doucette Mass. Banking Commission; CPA, audit firm with information and records regarding misconduct of Linda Doucette Mass. Banking Commission; CPA, audit firm with information and records regarding misconduct of Linda Doucette

C. Damages

Not yet calculated in detail or to finality. Current approximation of lost and futures: at time of termination, monthly gross \$4,000, exclusive of benefits, and exclusive of raises, bonuses. Emotional distress and other special damages cannot be determined at this time;

D. Insurance - not applicable

Plaintiff reserves the right to supplement and modify the information provided above.

Plaintiff, by her attorney,

 /s/ Scott Adams
Scott Adams (BBO# 639166)
92 State St., 9th Flr.
Boston, MA 02109
Tel: (617) 742-4554

dated: July 19, 2006